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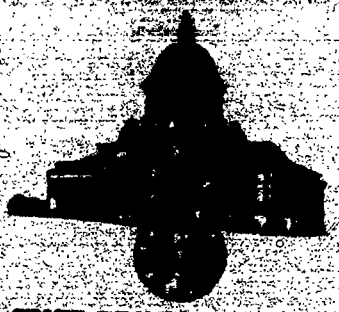
ABSTRACT

This report of the Legislative Budget Committee of the State of Washington addresses issues regarding students in the learning disabled (LD) category of special education including cost of identifying LD students, means of determining program eligibility, effectiveness of services, and student characteristics. The report is based on literature reviews and an analysis of statewide data including achievement test scores, assessment time data obtained from interviews in 9 school districts, and student files in 13 school districts. Major conclusions are: (1) the assessment process for identifying students as LD is expensive and has little diagnostic or programmatic value; (2) programs for LD and other students with mild handicaps provide little information on student outcomes or program effectiveness; and (3) many students identified as learning disabled are educationally similar to low achieving students in other programs. The major recommendation is legislation to authorize special services demonstration projects which would: provide waivers to state rules; promote non-categorical approaches through funding changes; encourage school districts to develop alternative means of identifying learning disabilities; increase the proportion of resources devoted to classroom instruction; and provide for technical assistance and staff development in local school districts. Appendices provide data tables and a summary of responses to the final report. (DB)



STATE OF WASHINGTON
LEGISLATIVE BUDGET COMMITTEE
506 EAST 16TH
OLYMPIA
98504

K-12 LEARNING DISABILITIES PROGRAM ISSUES

Report No. 91-1

A Report to the
WASHINGTON STATE LEGISLATURE
January 17, 1991

SUMMARY OF REPORT

A. Overview

This report addresses various issues regarding students in the learning disabled (LD) category of special education. Some of the issues are the cost of identifying LD students, means of determining program eligibility, effectiveness of services, and student characteristics. We concluded that:

- The assessment process for identifying students as LD is expensive and has little diagnostic or programmatic value. The process absorbs resources that could be spent on instruction.
- Programs for LD and other mildly handicapped students provide little information on student outcomes or program effectiveness.
- Many students identified as learning disabled are educationally similar to low-achieving students in other categorical programs.

The preliminary report (June 8, 1990) has been discussed over the last six months with various members of the legislature and the education community. Many people agree that the present system is not working well, but there is little agreement on what specific changes should occur on a statewide basis. Thus we propose to proceed via demonstration projects.

We recommend legislation to authorize special services demonstration projects, as outlined in the last chapter of this report (page 30-38). The legislation would:

- Provide for waivers to state rules.
- Promote non-categorical approaches through funding changes.
- Encourage school districts to develop alternative means of identifying learning disabilities.
- Increase the proportion of resources devoted to classroom instruction.
- Provide for technical assistance and staff development in local school districts.

B. Background

Federal legislation passed in 1975, known as Public Law 94-142, guarantees the rights of handicapped students to a "free and appropriate public education." Learning disabilities is one of the handicapping conditions included in the act. LD is an umbrella term to designate children with extraordinary learning problems that cannot be explained by mental retardation, sensory defects, or social or economic factors. According to many proponents, learning disabled persons do not process information in a normal manner because of presumed neurological damage or dysfunction.

The definition of learning disabilities contained in federal law, as with other available definitions, cannot be easily translated into practice. This means it is difficult to identify LD children in a reliable manner.

In Washington State during the 1989-90 school year, the average monthly LD enrollment was about 36,400, or 52 percent of all handicapped students between ages 6 and 21 and 4.7 percent of the K-12 enrollment.

The professional literature suggests that too many children are being identified as learning disabled. Experts tend to believe that a small fraction of children have learning disabilities in the neurological sense, but not the five or ten percent of the population suggested by LD advocates.

The chart on the next page lists the main research questions addressed in this report. It also shows our main sources of information.

C. Similarity of LD and Remedial Students

Programs designed to assist low-achieving students include special education for handicapped students, the federally-funded Chapter 1 remediation program in low-income areas, and the state-funded Learning Assistance Program. The existence of separate programs is sometimes thought to indicate that the students are educationally distinct. However, we found that LD and remediation program students are far more similar than different in terms of student achievement and instructional needs.

Achievement test scores of LD and remedial students are quite distinct from scores of regular education students, but they are similar to each other. The exception is that a number of LD students are clustered at the low end of the score distribution. The majority of LD and remedial students have similar, overlapping test scores.

We found that the same instructional methods, programs, books, and teachers are used for LD and remediation program students in some school districts. This practice is endorsed in research literature that recommends the same instructional programs and methods for each group.

Main Research Issues and Information Sources

1 **In terms of student achievement and instructional needs, are there significant differences between the students identified as LD (handicapped) and those identified for service in a remediation program (non-handicapped)?**

Sources: (a) Metropolitan Achievement Test, Oct. 1988 and 1989. Statewide 4th and 8th grade test results.
(b) Annual tracking of cohort achievement scores.
(c) Literature review on instructional methods/needs.

2 **Individualized assessment is required under state law to determine LD eligibility. What is the cost of assessment?**

Source: Assessment time data collected by LBC staff from 9 school districts, mainly by interviewing key staff.

3 **What is known about student outcomes and program effectiveness?**

Source: (a) Literature review.
(b) Student files in 13 school districts (see #4).

4 **What do eligibility and other program data indicate about the characteristics of students identified as LD?**

Source: Data collected by LBC staff from student files in 13 school districts. Includes 627 current LD students, plus 100 health impaired and 45 behaviorally disabled.

It thus appears that the two populations are similar in important respects and that most of the students could be served successfully in one program.

A major policy option is expansion of the Learning Assistance Program as an alternative to identifying so many students as handicapped. LAP now serves grades K-9 and could be expanded to K-12, with increased funding at all grade levels to accommodate students who would otherwise be labelled as LD. However, students with severe learning problems that cannot be addressed by an enriched LAP would continue to be served in the LD category.

This option to expand LAP is based on the similarity of a majority of the LD and LAP populations, the high cost of assessing LD students, and the ability of LAP to identify students at low cost and devote a much higher proportion of program resources to classroom instruction.

D. Assessment of LD Students

Students in LAP and Chapter 1 are usually identified by low performance on group achievement tests, at minimal cost. In contrast, we found high costs for identifying students as learning disabled.

We collected data from nine school districts to estimate the cost of the typical assessment process for an LD student. Assessment was defined in a broad sense, to include the entire process of referral, testing, eligibility determination, and placement in special education. We found that staff costs (average salaries and benefits) ranged from $411 to $930 per assessment. The costs of reassessment (every three years) are a little lower.

After reviewing assessment reports in some 700 student files, we concluded that the assessment information is often not relevant to special education programming.

1. Few assessments diagnose a specific problem and recommend a specific teaching strategy, method, or program.

2. Annual goals in the student's individualized education program (IEP) are often standardized statements and are not based on assessment data.

3. The assessment classifies the student in a particular handicap category (such as LD) for state funding purposes. But the label has little diagnostic and instructional programming value. Students with similar needs, regardless of category, are grouped together for instruction.

One reason for high assessment costs is that state rules exceed federal requirements. According to state rules, the assessment for learning disabilities must include use of individually administered tests of student intelligence and achievement. Federal law does not appear to require an IQ test at all. Also, federal law does not require any tests to be individually administered. The federal rules are general on many important issues, which should provide flexibility in changing the current state requirements.

We also found that local practices often exceed the state requirements. Fairly common examples are:

-- Forming assessment teams of five to ten staff. (Three are required.)

-- Administering two or three achievement tests. (One is required.)

-- Besides the IQ test, administering other psychological tests. (Only the IQ test is required.)

Problems with the assessment process might be summed up as follows:

-- The process consumes staff time and has limited diagnostic and instructional value.

-- The assessment provides the student with a handicap label, but the label has little influence on the type of instruction.

-- Assessment absorbs a large amount of funding that would be better spent on classroom services and other interventions.

-- State rules on assessment exceed the federal rules.

-- Local assessment practices often exceed state requirements.

E. Effectiveness Issues

Little conclusive information is available on LD student outcomes and program effectiveness. Anecdotal information, based on individual cases, suggests both successes and failures. Research studies are often inconclusive, but they generally leave an unfavorable impression of program effectiveness.

Annual goals are included on a handicapped student's IEP, and attainment of goals could in theory be used as an evaluation measure. However, we found that the IEP goals are often too vague to serve as standards by which student progress can be measured. We found many questionable practices. For example, IEP goals often indicate that the student will increase reading skills by a certain amount, as measured by a particular test. The test is then given repeatedly to the student, which invalidates the measurement.

Goals are also unclear at the program level, and little is known about the effectiveness of local programs or service delivery models. Program accomplishments are usually described in terms of various activities that were performed, not student outcomes. Few programs offered by local school districts contain an evaluation component. One apparent reason is that much staff time is devoted to program procedural requirements.

Federal and state data collection systems are largely devoted to reporting enrollment and process data, with little attention to student outcomes. No count is available of the number of special education students who leave the program and return to regular education.

Various studies have been conducted on outcomes for LD and other handicapped students after they leave school. Many unfavorable outcomes are reported, such as high rates of dropping out of school and high unemployment rates. These studies tend to be critical of the content of special education programs at the high school level.

F. Eligibility

Our report includes data on student characteristics and program eligibility collected from LD student files in 13 school districts.

We are critical of the "alternate method" of determining LD eligibility for grades 7 and up. School districts are required under state rules to use an "expectancy formula" to predict grade achievement and declare a student learning disabled if he is sufficiently below grade level. This method has no support in the current research literature as a valid way to identify learning disabilities. Twenty percent of our sample for grades 7 and up was eligible under this method.

We also take exception to a provision in the state rules known as "continuing eligibility." Under this provision the multidisciplinary team may continue a student indefinitely in special education on the grounds that the student's performance will be "adversely affected" unless he continues to receive special education. No supporting documentation is required.

The alternate method and continuing eligibility are used to retain in special education many low-IQ, low-achieving LD students. Consideration should be given to eliminating both methods. School districts will still be able to qualify a student as LD based on professional judgment. Moreover, an expanded LAP could insure that reasonable service options are available.

We examined use of the "regressed standard score discrepancy method" which was introduced in this state in 1984 as the primary means of measuring whether the student has a severe discrepancy between IQ and achievement test scores. Some fundamental problems are:

- The model appears to be programmatically irrelevant. Special education is often provided in subjects in which, according to the model, the student does not have a severe discrepancy.

- Among students with a severe discrepancy, program time per week has a weak relationship with the amount of discrepancy.

- A severe discrepancy between IQ and achievement test scores is not a unique identifier of a learning disability. The discrepancy could exist for many other reasons.

These points suggest that the model has questionable validity, or at least that the model is not being used properly in the field. Another complication is that the model, despite problems, may have to be retained because no one has yet proposed a superior method of identifying learning disabilities on a statewide basis. In that case consideration should be given to changing the model's criterion level, which determines the qualifying scores.

At the present criterion level a large number of students could qualify as LD. The model was not fully tested prior to implementation in 1984. In a random sample study conducted at a later date, SPI discovered that at the current criterion level the model identifies 14 percent to 30 percent of regular education students as learning disabled, depending on which achievement tests are used. This potential impact of the model can be averted by revising the criterion level.

If the regressed standard score discrepancy model is retained, we suggest that consideration be given to revising the criterion level so that the LD category is limited to students with a truly severe discrepancy between IQ and achievement. This could be accomplished by changing the criterion level for new students from 1.55 to 2.00 (equivalent to tightening the qualifying scores by five points). The present cutoff level could be retained for reassessments.

The concept of learning disabilities was developed on the basis of research that showed differences between specific learning disabilities and general mental retardation. It is often stressed that LD children have average or higher intelligence. Yet state rules on LD provide for a minimum IQ of 76, or lower in cases of professional judgment. Such scores are not "average." The average range is usually defined as 85 to 115.

If individual IQ testing is retained as a program requirement, consideration should be given to limiting the LD category to persons of average or above-average intelligence, defined as a minimum of 85 on the Wechsler scale. Students with IQs in the low 80s or high 70s could be served in LAP. School districts would retain the option under professional judgement to identify these students as LD.

We examined the rising enrollment in the Health Impaired category of special education, which has increased dramatically in this state since about 1984. The category was intended for medically-fragile children, but the enrollment has increased because of an influx of students diagnosed as having attention deficit disorder and other presumed neurological disorders. Washington is one of the few states to include these students in the Health Impaired category. The federal rules do not. Consideration should be given to modifying the state definition of health impaired.

G. Fiscal Changes to Support Early Intervention

Students with learning problems are referred to special education because they need services. The referral would be unnecessary in many cases if the appropriate services were available in regular education. We suggest that consideration be given to changing features of the current fiscal system

which make it difficult for funding to be available to support interventions in regular education prior to the identification of a student as handicapped.

The current funding arrangements contain distinct incentives to identify children as handicapped. A district receives special education funding based on the number of students identified as handicapped. No additional funds are received if the district provides similar services in regular education but does not label children as handicapped. Consideration should be given to finding a means to provide financial support for these services and reduce the incentives to refer children to special education.

We also suggest detailed examination of state funding formulas and school district budgeting practices to ascertain why social workers and psychologists are budgeted mostly in program 21 (handicapped). In such cases their services are confined (legally) to handicapped students or to students referred for handicap assessment. The formulas or the budgeting practices should be revised so that support services in regular education can be provided by a school psychologist or a school social worker.

H. Addendum on Demonstration Projects, December 1990

The preliminary version of this report (June 8, 1990) presented the above recommendations and was discussed extensively between June and December 1990. We found that many stakeholders agree that the present system is not working well and should be changed, but there is little agreement on specific changes on a statewide basis. Thus we propose to proceed via demonstration projects.

We recommend legislation to authorize special services demonstration projects, as outlined on page 34-38 of this report. We make suggestions on legislative intent, project duration, number of authorized projects, state administration, project funding, technical assistance, project reporting, and project evaluation.

The legislation would provide for waivers to state rules, promote non-categorical approaches through funding changes, encourage school districts to develop alternative means of identifying learning disabilities, increase the proportion of resources devoted to classroom instruction, and provide for technical assistance and staff development in local school districts.

The demonstrations would be intended in part to encourage more efficient use of available resources, such as the following practices:

- "Blending" (pooling) of categorical program resources, to help break down categorical program "walls" within school districts.

- Less "labelling" of students, so that students receive service in non-categorical settings without delays for eligibility determination.

- Decreased resources devoted to assessment (eligibility determination) and increased resources available for classroom instruction.

Besides focusing on efficiency issues, the project evaluation might also address the impact of the service delivery model on student learning.

I. Agency Comments

The Superintendent of Public Instruction formally concurs with the recommendation to authorize demonstration projects. See the letter printed at the end of this report. Written responses have also been received from various education associations, advocacy groups, and school districts. The matrix on page 44 summarizes those responses.

J. Acknowledgements

This study was conducted by Matt Temmel, Ph.D., and Lyle Davieau, M.B.A., of the LBC staff. Ron Perry, Ph.D., was the project supervisor. Extensive help in data collection was received from Jean Wessman, B.A., who was on loan to the LBC from the House Office of Program Research.

We appreciate the assistance provided by staff in the Office of Superintendent of Public Instruction, Office of Financial Management, local school districts, and the standing committees of the legislature. We are also grateful for the insights provided by parents and advocates who have an interest in improving the present system.

Cheryle A. Broom
Legislative Auditor

On January 17, 1991, this report was approved by the Legislative Budget Committee and its distribution authorized.

Representative Helen Sommers
Chair

A Note to the Reader

In presenting data collected in various school districts, the LBC staff do not intend to criticize school district performance. The main program issue in our opinion is the adequacy of the state rules, not school district performance.

The report is neutral on the question of whether too little or too much money is being devoted to educating students with learning disabilities or those served in remediation programs. The issue that we address is not adequacy of funding but rather the cost-effective use of the present resources. We believe that program changes should be made so that a much larger proportion of the total available resources is devoted to instruction and other services with direct benefits to students.

TABLE OF CONTENTS

I. Scope and Objectives

This study examines selected aspects of the handicapped program, with emphasis on students classified as specific learning disabled (LD). The study objectives are:

1. To describe LD students, programs, and services.

2. To analyze eligibility criteria, referral and assessment practices, and assessment costs.

3. To analyze program effectiveness or outcomes.

4. To compare student populations in the LD program and the Learning Assistance Program (LAP).

5. To identify relevant differences between state and federal requirements for the handicapped program.

II. Background

A. Introduction

This report addresses various issues about students in the learning disabled (LD) category of special education. The issues include student characteristics, program eligibility criteria, assessment practices and costs, program effectiveness, and other matters.

Federal legislation passed in 1975, known as Public Law 94-142, guarantees the rights of handicapped students to a "free and appropriate public education." Learning disabilities is one of the handicapping conditions included in the federal act. The federal definition has been incorporated into the state rules adopted by the Superintendent of Public Instruction (SPI).

During the 1989-90 school year the average monthly LD enrollment was about 36,400, or 52 percent of all handicapped students ages 6 to 21 and 4.7 percent of the K-12 population. Exhibit 2.1 on the next page shows the number and percent of LD students by student age. State handicapped allocations for the LD enrollment were a little under $89 million during the 1989-90 school year.

This report also deals with limited aspects of the Learning Assistance Program, a state-funded remediation program for grades K-9 for students who need help in basic skills training. According to projections, about 54,000 students were served during the 1989-90 school year in LAP reading, math, language arts, or readiness classes. The LAP funding is about $35 million a year.

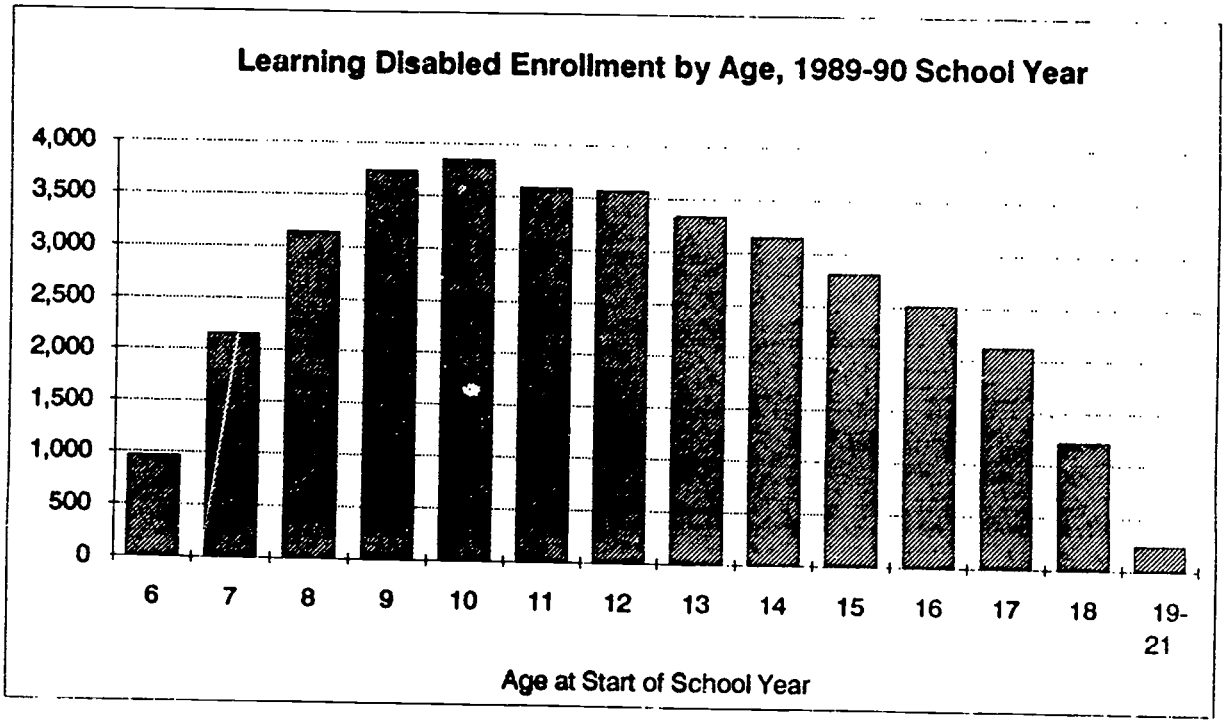
Another 65,000 students were served in 1989-90 in the federally-funded Chapter 1 regular program that is available in low-income areas. The Chapter 1 funding to school districts is about $46 million a year.

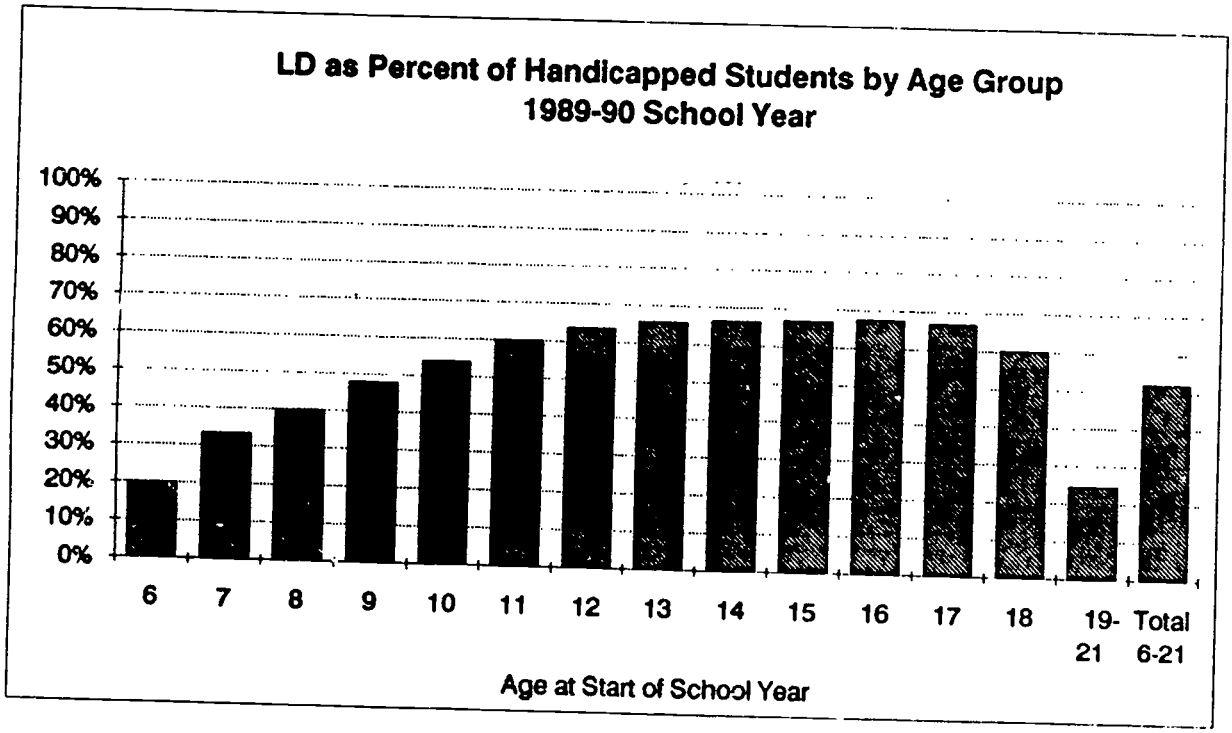
B. Definitions of Learning Disabilities

Learning disabilities is an umbrella term for persons of normal or above-average intelligence who have extraordinary learning problems that cannot be explained by sensory impairments or by unfavorable social or economic circumstances. According to many proponents, learning disabled persons do not process information in a normal manner because of presumed neurological damage or dysfunction.

The term learning disabilities was coined in 1962 and soon replaced various terms borrowed from medical research. Since 1962 at least 11 major definitions of learning disabilities have been proposed. Judging by the continuing debate in the professional literature, there is little consensus on an appropriate definition.

EXHIBIT 2.1


Learning Disabled Enrollment by Age, 1989-90 School Year
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
6
7
8
9
10
11
12
13
14
15
16
17
18
19-21
Age at Start of School Year


LD as Percent of Handicapped Students by Age Group
1989-90 School Year
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
6
7
8
9
10
11
12
13
14
15
16
17
18
19-21
Total 6-21
Age at Start of School Year

The federal and state definitions of LD refer to "disorders in basic psychological processes involved in understanding or using spoken or written language." These definitions are controversial because they omit reference to presumed neurological origins of LD and use instead the ambiguous and possibly demeaning phrase "disorders in basic psychological processes."

The federal and state definitions also refer to conditions such as perceptual handicap, minimal brain dysfunction, and dyslexia. These terms also create confusion because of disputed definitions.

The impact of these definitional problems is that it is difficult to translate the federal or state definition (or any other proposed definition) into practice and identify learning disabled children in a reliable manner.

By state statute, RCW 28A.13.010, SPI is required to adopt "functional definitions" and eligibility criteria for the various handicapping conditions. Many controversies about learning disabilities revolve around definitional issues. This topic will recur throughout the report.

C. LD Funding: The Four Percent "Lid"

While focusing on program issues, our study is relevant to the continuing debate over LD funding. Special education is funded by the state through a complex formula which, in essence, allocates a fixed amount per student according to handicap category, with adjustments for local salary factors. For 1989-90, the average allocation per LD student is estimated at a total of $4,637 in special education and basic education funds, or about $1,771 more than the average allocation per basic education student.

Actual average allocations will be considerably less because the full state funding is provided only if the LD enrollment does not exceed four percent of a district's K-12 enrollment. If a district's LD enrollment exceeds four percent, the allocation is reduced for the district's entire LD enrollment, and not just for those over the lid. In short, the funding formula (in conjunction with eligibility changes made in 1984) was designed to provide incentives to identify a maximum of four percent of the K-12 population as LD.

The incentives have not worked as intended. The statewide average enrollment for LD is 4.7 percent of the K-12 population. In 1988-89 a total of 189 out of 296 school districts had an LD enrollment that exceeded four percent.

D. Alternative Interpretations of LD

We reviewed the extensive literature on learning disabilities. The following points are suggested by recent data-based research:

1. Learning disabilities was included by Congress in federal law before experts agreed on a definition and identification criteria. There is still no agreement.

2. There is widespread concern in the research literature that too many children are being identified as learning disabled. Only a small fraction of the children identified as LD have been diagnosed as having neurological impairments or information processing problems.

3. Some researchers are beginning to question the presumed neurological basis of learning disabilities. Further, they suggest that the learning problem may not reside in the child but can be traced to inadequate instructional methods and to other situational factors.

The LD field evolved out of research on brain-injured soldiers and other subjects. It was observed that brain-injured persons had certain cognitive and behavioral problems that did not exist prior to the brain injury. Eventually it was assumed that children who manifested the same learning and behavioral problems must have brain damage.

Some researchers question this logic, criticize the methods of previous research, and disagree with some fundamental axioms of the LD field, including the presumed neurological basis of the disability.[1]

Some critics also question the assumption in the current system that the child has a learning problem because of an internal deficit. The alternative view is that learning problems can often be traced to factors such as domestic conditions, social problems, or improper instruction.

For example, many supporters of phonics-based reading instruction assert that "reading disabilities" are often the result of instructional methods that neglect phonics and rely on the "whole language" approach.

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[1] See Gerald Coles, The Learning Mystique: A Critical Look at "Learning Disabilities" (New York, Pantheon, 1987) and Kenneth A. Kavale and Steven R. Forness, The Science of Learning Disabilities (San Diego, College Hill Press, 1985).

E. Report Issues and Data

The chart below lists the four main research questions addressed in this report and our major sources of information. The following chapters address the four questions, in the order shown in the chart.

Exhibit 2.2

Main Research Issues and Information Sources

1 **In terms of student achievement and instructional needs, are there significant differences between the students identified as LD (handicapped) and those identified for service in a remediation program (non-handicapped)?**

Sources: (a) Metropolitan Achievement Test, Oct. 1988 and 1989. Statewide 4th and 8th grade test results.
(b) Annual tracking of cohort achievement scores.
(c) Literature review on instructional methods/needs.

2 **Individualized assessment is required under state law to determine LD eligibility. What is the cost of assessment?**

Source: Assessment time data collected by LBC staff from 9 school districts, mainly by interviewing key staff.

3 **What is known about student outcomes and program effectiveness?**

Source: (a) Literature review.
(b) Student files in 13 school districts (see #4).

4 **What do eligibility and other program data indicate about the characteristics of students identified as LD?**

Source: Data collected by LBC staff from student files in 13 school districts. Includes 627 current LD students, plus 100 health impaired and 45 behaviorally disabled.

III. LD and Remedial Students: Similar Populations

This chapter addresses the following question: In terms of student achievement and instructional needs, are there significant differences between the students identified as learning disabled (handicapped) and students identified for service in a remediation program (non-handicapped).

The existence of separate categorical programs might suggest that the two populations have significant differences. However, recent evidence strongly indicates that LD and remedial students are educationally more similar than different.

A. Test Scores

The Metropolitan Achievement Test, a standardized group achievement test, is given to 4th, 8th, and 10th grade students each October in every school district in Washington. We analyzed the 4th and 8th grade scores to compare performance of LD, remedial, and regular education students on a statewide basis. (The "remedial" students are those served in the Learning Assistance Program, Chapter 1, and other remedial programs.)

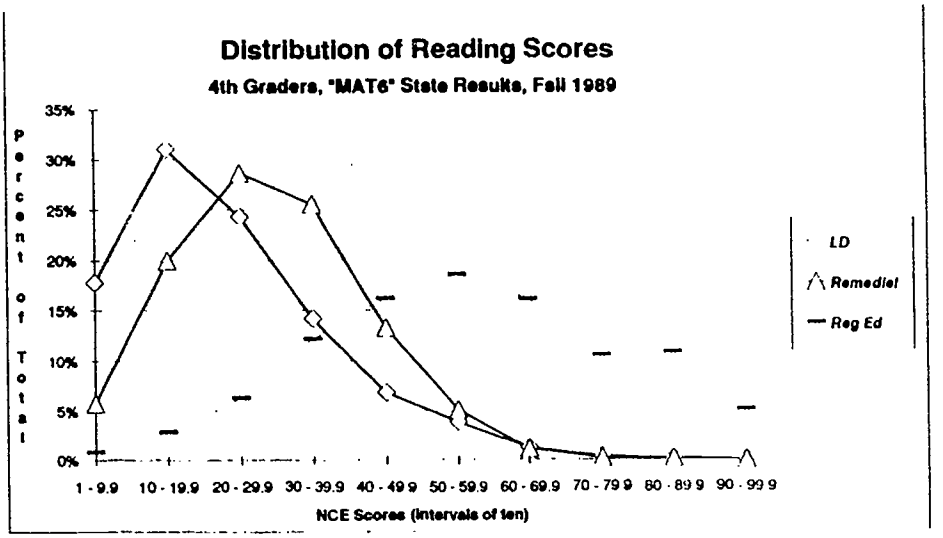
The LD students have the lowest average scores. Mean scores of the LD group are six or seven points lower than the mean scores of remediation program students. However, the standard deviations are very high. This indicates that the data are spread out over a wide range and that mean scores are not the best indication of group characteristics. The scores distributions are more revealing, as shown in the graphs on the next page.

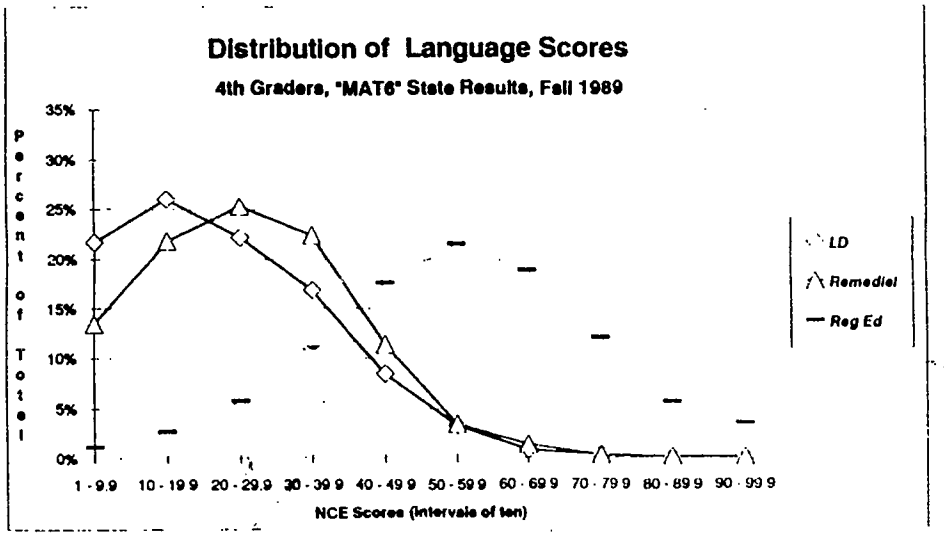
Both the LD and remedial distributions are skewed toward the lower scores, and both are distinct from the scores of regular education students. The overlapping distribution of LD and remedial scores suggests that the two populations are similar in terms of achievement.

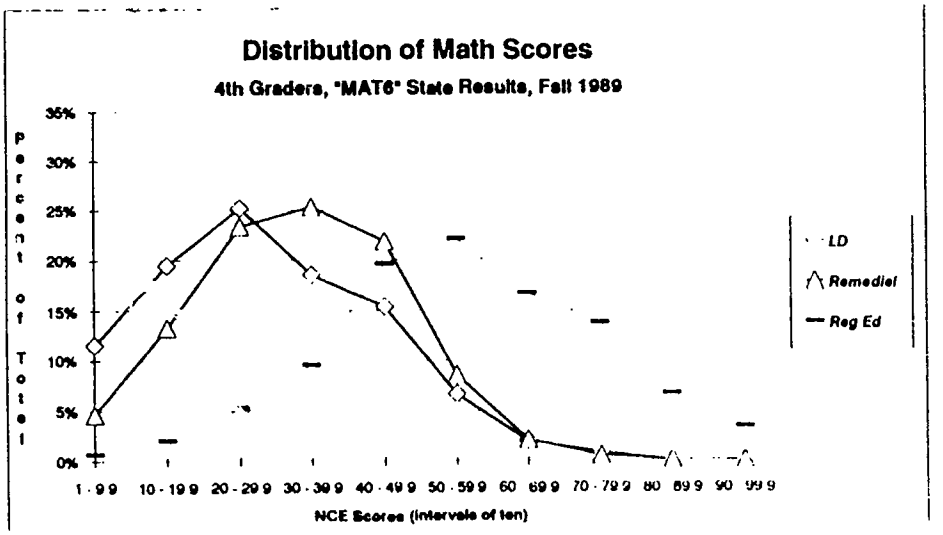
We also tracked individual student scores to compare year-to-year gains between LD and remedial students. This analysis could not use statewide data, since only 4th, 8th, and 10th graders are tested. Therefore, we collected data from school districts that administer standardized achievement tests to all elementary students each year. We tracked scores over two years in Franklin Pierce school district and over three years in Edmonds, Issaquah, North Thurston, and Olympia school districts.

In each of these five districts, we found no significant difference between LD and remedial students in terms of annual changes in test scores.

EXHIBIT 3.1


Distribution of Reading Scores
4th Graders, "MAT6" State Results, Fall 1989
Percent of Total
35%
30%
25%
20%
15%
10%
5%
0%
1 - 9.9
10 - 19.9
20 - 29.9
30 - 39.9
40 - 49.9
50 - 59.9
60 - 69.9
70 - 79.9
80 - 89.9
90 - 99.9
NCE Scores (intervals of ten)
LD
Remedial
Reg Ed


Distribution of Language Scores
4th Graders, "MAT6" State Results, Fall 1989
Percent of Total
35%
30%
25%
20%
15%
10%
5%
0%
1 - 9.9
10 - 19.9
20 - 29.9
30 - 39.9
40 - 49.9
50 - 59.9
60 - 69.9
70 - 79.9
80 - 89.9
90 - 99.9
NCE Scores (intervals of ten)
LD
Remedial
Reg Ed


Distribution of Math Scores
4th Graders, "MAT6" State Results, Fall 1989
Percent of Total
35%
30%
25%
20%
15%
10%
5%
0%
1 - 9.9
10 - 19.9
20 - 29.9
30 - 39.9
40 - 49.9
50 - 59.9
60 - 69.9
70 - 79.9
80 - 89.9
90 - 99.9
NCE Scores (intervals of ten)
LD
Remedial
Reg Ed

B. Instructional Needs

We found that most LD and remedial students are instructionally similar. This finding is based on (1) observations and interviews in school districts, and (2) a review of professional literature.

Both LD and remedial students are usually taught in "pull out" classes with some form of direct instruction. In a few districts that we visited, the teachers and the curriculums are deliberately the same for LD and remedial students, either in separate classrooms (e.g., Franklin Pierce) or in "blended" classes (e.g., Mukilteo and Edmonds).

Most districts that we visited have different teachers and curriculums for each program. This practice appeared to us to be the accidental result of the administrative separation of remedial and special education programs in those districts, rather than a matter of deliberate local instructional policy.

According to recent professional literature, the same instructional methods and programs are recommended for LD and remedial students. This is a major reversal of teaching strategies used for LD students in the 1960s and 1970s. Programs for LD students during those years often focused on overcoming deficits in the learning modalities, such as visual perception, auditory perception, and visual-motor coordination. However, this "process training" was found generally to be ineffective and has now been abandoned.

Materials published by the Orton Dyslexia Society indicate that the instructional programs and methods recommended for dyslexic children are also recommended for other children with reading problems, such as those from disadvantaged backgrounds who are served in remediation programs.[1]

Vellutino's work on dyslexia shows that dyslexics cannot be distinguished from other poor readers in terms both of symptoms and treatment. He writes that dyslexics (poor readers because of an internal abnormality) have reading behaviors that are very similar to those of other poor readers whose problems stem from poor teaching or limited experience. The "reversal errors" previously thought to characterize dyslexics account for only 20 to 25 percent of their reading errors and do not distinguish them from other poor readers, who also make "reversal errors." According to Vellutino, the remedy is the same for members of each group: direct instruction, intensive tutoring, and a balanced reading program.[2]

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[1] See Jeanne S. Chall, "The Importance of Instruction in Reading Methods for All Teachers," and Joanna P. Williams, "Educational Treatments for Dyslexia," in Intimacy with Language (Baltimore, Orton Dyslexia Society, 1987).

[2] Frank R. Vellutino, "Dyslexia," Scientific American, March 1987.

Jenkins and colleagues at the University of Washington have examined issues concerned with the effective instruction of students in the various categorical programs (such as special education, LAP, and Chapter 1). The researchers found similar needs across programs in terms of learning rate, instructional level, and need for a particular methodology. They concluded that "the instructional rationale does not support a continuation of separate systems, and that a unified program would be more instructionally valid."[3]

C. Conclusions

The LD and remedial student populations are educationally more similar than different. This conclusion is initially suggested by the overlap in achievement test scores. It is perhaps more significant that the same instructional methods are now recommended in LD and remedial program settings. Based on these facts, we can appreciate why experts question the existence of separate categorical programs for low-achieving students.

It appears that the majority of children currently served in LD programs could be equally well served in remediation programs if the funding arrangements were changed. We recognize that some children identified as LD have severe learning and behavior problems and need a much higher level of service than could be provided in remediation programs such as LAP or Chapter 1. However, for the majority of children served in LD or the remediation programs, the services would appear to be interchangeable.

A major policy option to be considered is expansion of the Learning Assistance Program as an alternative to identifying students as handicapped. LAP now serves grades K-9. The program could be expanded to K-12 and funding increased significantly at all grade levels in order to offset changes in the LD eligibility criteria suggested later in the report. The intent of this approach is to make LAP a genuine alternative to placing a student in special education.

This option to expand LAP is based on the similarity of a majority of the LD and LAP students, the high cost of LD assessment, and the ability of LAP to identify students at low cost and devote a much higher proportion of program resources to classroom instruction.

Since the majority of LD and remedial students are educationally similar, we considered the costs of identifying each group and placing them in a program. Students in LAP or Chapter 1 are usually identified by performance on group achievement tests, at low cost to the district. (We were told that the cost is $5 to $10 per student.) In contrast, the cost of identifying students as learning disabled is much higher, as shown in the next chapter.

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[3] Joseph R. Jenkins, Constance G. Pious, and David L. Peterson, "Categorical Programs for Remedial and Handicapped Students: Issues of Validity," Exceptional Children, October 1988.

IV. Assessment of LD Students

This chapter examines the individualized assessment that is required to identify handicapped students and determine their eligibility for special education in the learning disabled category. We consider the cost and educational relevance of the process that is required under state rules.

We found that the process is expensive and has questionable value in terms of diagnosing a specific problem and recommending an appropriate educational program. We also found that the state rules on assessment exceed federal requirements in major respects. In addition, we found that local practices exceed the state requirements.

A. Staff Cost of Assessment

Students suspected of having a learning disability are referred to special education for assessment. Under both federal and state law, the assessment must be performed by a multidisciplinary team composed of at least three persons. The main purpose of the assessment is to determine student eligibility for special education, which is redetermined every three years.

The following cost estimates refer to "assessment" in a broad sense, starting with the referral to special education and ending with formulation of the student's Individualized Education Program (IEP). The data refer to the entire process of eligibility determination and placement in program. Among other things, the process includes psychological and academic testing, team meetings to discuss referrals and test results, determination of eligibility, parent notification and participation, and various other required activities.

We divided the assessment process into some 20 activities required under state law. We then collected data on type of school district staff who typically perform each activity and the usual amount of time involved. The data were obtained in most districts from interviews with key staff.

In Tacoma, at the request of the district special education director, data collection forms were distributed to a number of schools and used by field staff to record their time on actual assessments. Actual field data were also collected in the Olympia school district, although the final estimates were derived by the interview method.

The chart on the following page shows our results from nine districts.

Exhibit 4.1

Routine Assessments of LD Students: Staff Time and Cost

	INITIAL ASSESSMENTS			REASSESSMENTS		
District	Staff on Team	Staff Hours	Staff Cost **	Staff on Team	Staff Hours	Staff Cost **
Tacoma	10	29.0	$930	10	20.0	$605
Vancouver	5	26.2	$805	5	21.2	$644
Seattle	6	24.8	$741	6	13.5	$408
Issaquah	5	22.9	$713	5	11.9	$363
Vashon Island	8	21.0	$640	8	16.9	$510
Olympia	5	20.9	$668	4	11.8	$372
Aberdeen	5	18.8	$574	4	14.1	$424
College Place	4	14.3	$443	4	13.4	$415
Finley	6	13.8	$411	6	11.2	$332

** Costs are based on local assessment times and STATEWIDE average salaries and benefits for the staff positions included on the assessment teams. This approach eliminates inter-district differences due to local salaries.

LBC:MT 2.27.90

The chart may underestimate staff time and costs for LD assessment:

1. The data refer to "routine" assessments, not extreme cases. If an assessment team has a difficult case, the time expended in the process can easily double. However, the time for assessing easy cases in the selected districts is not much less than shown in the chart.

2. Assessment data include the cost of developing a student's IEP, which is required for each handicapped student under federal and state law. Recent monitoring by the U.S. Office of Special Education Programs found deficiencies in how IEPs are formulated, such as failing to include short-term instructional objectives in measurable terms. To correct this compliance problem, school districts will have to devote more time to developing IEPs.

These costs might be compared with the federal funding to school districts of $249 per handicapped student per year in Public Law 94-142 Part B funding. A precise comparison of this revenue with assessment costs would require information on the number of assessments and reassessments for at least one year, and ideally over several years. Few school districts maintain this information.

Judging from the limited information that was provided to us, we believe that the cost of assessing LD students in most or perhaps all of the districts shown in the chart exceeds the federal revenues and also consumes a significant portion of state funding.

B. Educational Relevance of Assessment and "Labelling"

Once a student has been determined eligible, the team develops an Individualized Education Program (IEP), which describes the kind and amount of special education to be provided. After visiting 13 school districts and reading some 700 assessment reports and the ensuing IEPs, we formed an opinion as to whether the assessment information contributes significantly to educational programming.

Generally speaking, we found that assessment data have limited influence on the services that are provided in the districts that we visited:

- Very few assessments include recommendations of specific instructional methods for the individual LD student.

- IEP goals are often standardized statements that are used for many students. Thus the so-called individualized assessment may not result in truly individualized goals and education programs.

-- Special education services are routinely provided in many districts in subject areas in which, according to the assessment data, the student does not have a severe discrepancy between ability and achievement. (For details, see page 24 below.)

We found few assessments in which a specific problem is diagnosed and a recommendation made on an appropriate teaching strategy, method, or program. This practice is inconsistent with the precepts found in standard textbooks that the assessment should be "functional" or "diagnostic." One authority says that the assessment process must document a need for special education by specifying the specific program needed by the child. If that criterion is not met, "a child will just have a label."[4]

The main result of the assessment process is determination of eligibility for special education in a particular handicap category. Classification (or "labelling") is relevant to state funding, which is based on enrollment by handicap category. According to the experts, however, the label does not have diagnostic or instructional value for mildly handicapped students.

Historically, handicapped students were classified in particular categories so they could be grouped for instructional purposes. Ideas have changed over the years, however, and there now appear to be no instructional methods that are unique to LD students (or to other categories of mildly handicapped students). Accordingly, LD students are routinely mixed with students who have other labels.

Ysseldyke's recent review of classification issues suggests that the main reason why handicap categories are retained is that advocacy groups are organized on the basis of handicap labels.[5]

Notable testimony was given to the LBC in April 1990 on the topic of "Assessments, Labels, and Services." The three main points in that testimony were:

1. The cost of individualized assessment is high.
2. "Labelling" pervades special education but is of questionable usefulness.
3. Educational services (such as the special curriculum and instructional methods) are usually independent of assessment findings and labels.

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[4] Samuel Kirk and James Gallagher, Educating Exceptional Children, 4th ed., 1983, p. 368. Samuel Kirk is the pioneer who coined the term "learning disabilities" in 1962.

[5] James E. Ysseldyke, "Classification of Handicapped Students," in Handbook of Special Education Research and Practice, vol. 1, ed. Margaret C. Wang et al. (Oxford, 1987), pp. 253-71.

C. State and Federal Requirements

Federal rules for Public Law 94-142 are written in general terms. Many key terms are undefined. The lack of specificity creates problems of interpretation. It also provides states with considerable flexibility.

Washington State rules on assessment of an LD student are quite specific and thus exceed the federal requirements. The state rules (WAC 392-171-411) require that "tests used to assess the student's intellectual ability and academic achievement shall be . . . individually administered and interpreted by a qualified person," who must be a school psychologist. This provision differs from the federal rules in three respects:

- The federal rules do not necessarily require individual administration of tests, in the sense of a one-on-one administration of a battery of tests. New approaches might be developed in which individual placement decisions are based on the results of group tests.

- The federal rules do not necessarily require an IQ test. New approaches might be developed in which normal intelligence is assumed unless the student's record contains evidence to the contrary.

- The federal rules do not require that the diagnostician on the team must be a psychologist. The federal rules also mention a remedial reading teacher or a speech-language pathologist.

Perhaps the best example of the general nature of the federal rules is the requirement that a learning disabled student must have a "severe discrepancy between achievement and intellectual ability." None of the terms in the quoted phrase is defined in the federal rules, thus providing states with little guidance and much flexibility. State rules in Washington since 1984 have required use of the regressed standard score method of calculating a severe discrepancy (at least for students through grade 6), as discussed elsewhere in the report.

In summary, it can be said that the state rules go beyond federal law in requiring a one-on-one administration of an IQ test and an achievement test, while also requiring use of a particular method to calculate a severe discrepancy between ability and achievement. The federal rules are general and could support other approaches.

D. Local Practices and State Requirements

Local practices often exceed the state requirements. According to the state rules, a team must include at least three persons. In the districts where we collected data on this issue, the teams ranged from four to ten persons.

The state rules require administration of one standardized achievement test. This is the most common practice. However, we also found many instances in which two, three, or more tests are given. In some cases this was "test shopping" in order to find a low qualifying score and determine a student eligible under the regressed standard score discrepancy method.

Under the state rules the psychologist must administer an IQ test, and no other psychological testing is required. We found several districts in which the school psychologist also administered tests of perceptual-motor skills. In textbooks on assessment, these tests are criticized for their low reliability. We found one district (out of 13 in which we read files) in which the psychologist routinely administered a "projective" test that allegedly provided a key to personality development and psychological problems.

E. Conclusions

It is difficult to explain the high costs of the LD assessment process, especially since the assessment information appears to have a marginal relationship with diagnosis of a specific problem or formulation of an instructional program. Many questions could be asked about the cost variations between districts. However, the main question is not district performance but rather the appropriateness of the state rules.

The state rules establish the assessment requirements and force school districts to devote a large portion of their funding to activities that have questionable educational relevance. It also appears that the state rules on assessment exceed the federal requirements, which are general and could be implemented in many different ways. Thus it might be possible for the state to develop new methods that devote less time to procedural requirements and more time to classroom instruction and other services.

Within the general framework of federal handicapped law, two approaches might be considered:

- Allow local districts flexibility in how they identify LD students.
- Try to maintain statewide uniformity and develop a new approach to identifying mildly handicapped students. This approach would probably end use of particular handicap categories such as LD in favor of a more general category of "educationally handicapped" students.

Another approach to be considered is to revise the LD eligibility criteria and provide needed services instead through the Learning Assistance Program, which does not require individualized assessment.

V. Effectiveness Issues

Little conclusive information is available on the effectiveness of LD programs. Federal and state laws require educational services to be provided, but do not require effectiveness data to be collected. In addition, federal and state rules do not define program goals and objectives. As a result, data collection systems in Washington's school districts are largely devoted to reporting enrollment and process data, with little attention given to student outcomes.

While some effectiveness information is maintained for individual students, we found the quality of data to be of questionable value. Anecdotal information, based on individual cases, suggests both successes and failures. Research studies of program effectiveness are often inconclusive, and they generally leave an unfavorable impression.

A. Program Goals and Reporting

Federal and state governments have not clearly identified program goals and objectives for LD programs. However, federal and state regulations do require school districts to report enrollment and process information. Consequently, although district information systems report required information, much of the district data is not particularly useful in determining program effectiveness.

The goal of PL 94-142 is "to assure the free appropriate public education of all handicapped children." However, PL 94-142 does not describe what constitutes an "appropriate" education for LD children. Both federal and state definitions of LD program goals are broad.

Experts in the field of learning disabilities have been equally unable to devise widely accepted goals and objectives for LD programs, largely due to disagreements over the definition of learning disabilities.

Federal and state data collection systems are devoted to reporting enrollment and other process data as required by law. Little attention is given to student outcomes, because federal and state laws do not require a large amount of outcome data to be collected. For example, no count is available of the number of special education students who leave the program and return to regular education.

As a result, school districts and state education agencies report program accomplishments in terms of various activities performed, not student outcomes. Few programs offered by local school districts contain an evaluation component. Administrators told us they are unwilling to devote resources to

evaluate LD services because too many resources are already diverted away (during assessment) from providing services to students.

Much of the information collected by the federal government is reported in the Eleventh Annual Report to Congress on the Implementation of The Education of the Handicapped Act. This 450-page document reports snapshots of handicapped enrollment by student age and handicap category.

About ten percent of this annual report is devoted to a review of program outcomes. Part of the outcome data is a compilation of data reported by the states, while the rest is a summary of recent studies.

The federal government has collected limited outcome data from states for the past three years. Outcome data elements appear to be too general to be especially useful: the number of students graduating, receiving a completion certificate, reaching the maximum age, dropping out, or "other." In addition, the data appears to be inconsistently gathered from state to state, rendering further analysis unproductive.

The remainder of the outcome data presented in the federal report are the results of recently-conducted studies. However, the report cites wide variations in reported outcomes caused by differing methodologies and definitions. *Probably the most telling statement in the program effectiveness section of the annual report is a call to collect well thought out, longitudinal data.*

Longitudinal data is valuable because it tracks individual students over a period of years, as opposed to more traditional studies lasting for months. Longitudinal data therefore allows a more thorough analysis of program effectiveness.

B. Student Data Unreliable

While anecdotal evidence of individual student successes and failures exists, we found little conclusive information on student performance. We reviewed student Individual Educational Programs (IEPs) for a large number of LD students, along with evaluations of their performance. Generally, evaluations of progress were unclear and, in some cases, misleading.

Annual goals are included in each LD student's IEP. Attainment of annual goals could, in theory, be used as an evaluation measure. However, we found that the IEP goals are often too vague to serve as standards by which student progress can be measured.

We also found questionable evaluation practices. In some instances, students are given the same test year after year. In other cases, progress is measured by fractional increases in grade level.

For example, IEP goals often indicate that a student will increase reading skills by a certain amount, as measured by a particular test. The test is then given repeatedly (annually in some cases) to the student. Psychologists told us that it is impossible to factor out the effects of previous exposures to the test, thereby invalidating the results.

In addition, small changes in grade level are frequently used to measure student progress. An example would be to consider a change in grade level from 5.2 to 5.7 as a half-year gain in progress. Textbooks written about the assessment process (as well as instructions included with tools used to estimate grade equivalents) indicate that such a conclusion is unreliable, as grade levels are a general guide and are not meant to be subtracted from one another to measure progress.

C. Studies Generally Unfavorable

Various studies have been conducted on outcomes for LD and other handicapped students after they leave school. Many unfavorable outcomes are reported, such as high rates of dropping out of school and high unemployment rates. These studies tend to be critical of the content of special education programs at the high school level.

-- Mariana Haynes and Joseph Jenkins of the University of Washington are critical of past and current outcome studies. They write:

"Questions of efficacy are not altogether new in special education; in fact, they have haunted this field since the 1950s. As a whole, the efficacy literature presents a conflicting array of findings that leaves an unfavorable impression of special education's effectiveness."[1]

-- A five year tracking study sponsored by the Seattle School District found that 44 percent of Seattle's LD/BD students dropped out, compared with 18 percent of the regular education students who dropped out.[2]

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[1] Mariana C. Haynes and Joseph R. Jenkins, "Reading Instruction in Special Education Resource Rooms," American Educational Research Journal, Summer 1986, 23, 2, 161-190.

[2] Mary Beth Celio, Falling Through the Cracks: A Study of Dropouts in the Seattle Public Schools, 1989.

-- Eugene Edgar, professor at the University of Washington, writes that the secondary level curriculum has little impact on handicapped students' eventual adjustment to the community - what happens after graduation appears to be more closely related to student ability level, family characteristics, or other nonschool-related factors. He concludes that the curriculum should shift toward functional, vocational, and independent living tasks.[3]

-- Mark Shinn of the University of Oregon concludes that outcome data collected by schools is generally unsystematic, subjective, and of insufficient quantity.[4]

D. Conclusions

It is important to remember that laws dealing with special education focus primarily on ensuring that local school districts provide services to eligible students. There is no requirement that students must achieve a set of individualized outcomes.

It is not surprising that, with the exception of a few school districts, very little effectiveness data is currently being collected. Generally, program goals are vague, and individual student goals, even when specified, are not adequately measured. Available research tends to be inconclusive or negative about the effectiveness of LD programs.

Until program and individual student goals are clearly defined and objectively measured, questions about the effectiveness of services to LD students will remain unanswered.

If the legislature authorizes pilot programs, each program should have sufficient duration to provide longitudinal information, and administrators should be required to provide an evaluation of program costs and benefits.

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[3] Eugene Edgar, Secondary Programs in Special Education: Are Many of Them Justifiable?

[4] Mark R. Shinn, "Does Anyone Care What Happens After the Refer-Test-Place Sequence: The Systematic Evaluation of Special Education Effectiveness," School Psychology Review, 1986, Vol. 15, No. 1, 49-58.

VI. The Problematic Nature of Learning Disabilities

In this chapter we first discuss some underlying problems in LD definitions and identification criteria. We then discuss our findings based on data collected in 13 school districts.

A. Definitions and Identification Criteria

Much of the confusion about learning disabilities is attributable to problems of definition and the difficulty of translating a vague definition into practice. This issue was recognized by Samuel Kirk, who invented the term "learning disabilities" in 1962. The following sentence later appeared in his textbook on special education: "No definition, no matter how comprehensive, is worth much unless there are ways to translate its abstract concepts into some form of practical action."[1]

The federal and state definitions of learning disabilities are very similar and suggest that an LD student has problems processing information. The definitions are based on the view that the mind contains certain psychological or psychoneurological processes (e.g., auditory, visual, tactile, motoric, and vocal) that are required for cognitive development and academic performance.

When the federal definition of learning disabilities was first developed in the late 1960s, it was thought that defects in these processes could be diagnosed and treated. Tests were available to identify information processing deficits. By the late 1970s, however, the processing tests had been discredited as unreliable. Nothing has been developed to replace them. Practitioners thus speak of the difficulty of "operationalizing" the LD definition.

The federal government faced this problem in 1977 when it adopted program rules to implement Public Law 94-142. The rules included "criteria for determining the existence of a specific learning disability." The main criterion is "a severe discrepancy between achievement and intellectual ability." This criterion does not exactly fit the definition. It is possible to have a severe discrepancy for many other reasons besides information processing problems.

Another complication is that federal law does not indicate how a discrepancy should be measured. Various measurement techniques have been developed, such as the regressed standard score discrepancy method introduced in Washington State in 1984. About seven states have adopted this method. Various other methods are used in other states. All states have experienced difficulty in identifying learning disabilities in a uniform, fair, and valid manner.

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[1] Kirk and Gallagher, Educating Exceptional Children, 4th edition, 1983, p. 121.

B. Student Characteristics

The following analysis is based on data collected in 13 school districts on 627 students identified as learning disabled. The students were in 5th or 9th grade and receiving special education services at the time of data collection by the LBC staff (October-November 1989).

The 13 districts had a total of about 22 percent of the state K-12 enrollment and 24 percent of the LD enrollment. The districts are listed in appendix 2 at the end of the report. Appendix 2 also contains a table with the results of aggregated data from the 13 districts.

1. General Characteristics and Eligibility Status

We found an LD population that includes many boys, many behavior problems, and few suspected neurological impairments.

For 25 percent of the students in our combined 5th and 9th grade data, the file included mention of social or economic problems that might have a detrimental impact on student learning. According to federal law, the teams are not supposed to identify a child as LD "if the severe discrepancy between ability and achievement is primarily the result of . . . environmental, cultural or economic disadvantage." This requirement is often disregarded. Many educators told us that they do not believe that a child should be excluded from special education on these grounds. Moreover, the federal law may set an impossible task in requiring teams to determine the role of these factors in learning problems.

The following table summarizes the percentage of students who were eligible under the various methods permitted by the state rules:

	5th Grade	9th Grade
Regressed standard score method	79%	56%
Alternate method (grades 7 and up)	--	20%
Professional judgment	21%	20%
Continuing eligibility	--	3%

Among the 9th graders in our data, about 44 percent qualified as LD by an exceptional method, including professional judgment, the "alternate method" for grades 7 and up (discussed below), or "continuing eligibility" (discussed below). These three subgroups are all notable for minimal discrepancy between IQ and achievement. IQ scores in all three groups averaged 87 to 89, or about 9 points lower than the students with a severe discrepancy. Such IQ scores are sometimes described as "low normal" and associated with "slow learners."

2. The "Alternate Method"

Twenty percent of the 9th graders in our data qualified as LD under the "alternate method," which applies to grades 7 and up (WAC 392-171-418). Under this method school districts are required by state rules to use an "expectancy formula" of their own choosing to predict grade-level performance based on IQ and age, and then qualify a student as LD if performance is less than two-thirds of the expected level.

The "alternate method" has no support in the current research literature as a valid way to identify learning disabled students. By its nature the method selects many lower-IQ students who have been retained in school one or more years. It is possible that these students could be served in the Learning Assistance Program.

The "alternate method" for grades 7 and up is similar to the LD eligibility criteria that were abandoned for the lower grades in 1984 when the regressed standard score discrepancy method was adopted. The old method was retained for grades 7 and up to make it easier for students to qualify for special education once they left the state remediation program, which at the time extended through grade 6. LAP is now available through grade 9.

In chapter III of this report, we suggest that LAP be expanded through grade 12. Consideration should be also given to eliminating the "alternate method" as an allowable procedure for identifying a learning disability.

3. "Continuing Eligibility"

The state rules on special education contain a provision known as "continuing eligibility" (WAC 392-171-325[3] and 331[3]). This provision states that a student, upon being reassessed and found not to meet the initial eligibility criteria, may be continued in special education if the team concludes that the student's performance will be adversely affected if he is terminated from special education. The team must simply state its opinion to this effect, without providing any supporting documentation.

"Continuing eligibility" is not required by federal handicapped law (PL 94-142). Few if any other states in the country appear to have such a provision.

In our LD data we counted three percent of the 9th graders as "continuing eligibility" cases. The actual percentage is probably larger because the basis for eligibility is sometimes not clearly stated in the school records. When that occurred, we counted the student as eligible by professional judgment.

Consideration should be given to eliminating "continuing eligibility" on the grounds that it is not required under federal law and that it amounts to a professional judgment decision without supporting documentation.

4. Regressed Standard Score Discrepancy Method

The regressed standard score discrepancy method was introduced in this state in 1984 as the primary means of measuring whether the student has a severe discrepancy between IQ and achievement test scores.

This method has little connection with the subjects in which special instruction is provided. Special education is often provided in subjects in which, according to the assessment, the student does not have a severe discrepancy between ability and achievement. This fact was initially reported in an SPI study published in 1986.[2] We found the same in our study.

In our 5th grade data, for example, 136 students did not have a severe discrepancy in reading on any test administered in the assessment process. Yet 91 of those students (67%) had an IEP goal in reading, which indicates that they receive special instruction in reading.

This practice, in combination with the high cost of assessment, helps to explain why special education expenditures in many school districts exceed the state allocations. The practice also suggests that the regressed standard score discrepancy method of assessment and eligibility determination is programmatically irrelevant.

We also analyzed special education program time (hours per week) in relation to various factors. We found that the amount of discrepancy as measured by this method has a very weak relationship with the amount of program time.

Another problem is that the model is a measurement tool only and does not indicate anything about the reasons for the discrepancy. The model's ability to identify learning disabled children, in the sense of those having information processing problems, depends on other likely explanations being excluded by the multidisciplinary team. As previously mentioned, the teams often do not exclude environmental, cultural, or economic factors because of the difficulty and perceived unfairness of doing so.

These problems with the model can be summed up as follows:

-- The model appears to be programmatically irrelevant. Special education is often provided in subjects in which, according to the model, the student does not have a severe discrepancy.

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[2] Superintendent of Public Instruction, "Final Report: an Evaluation of the Impact, Effectiveness, and Bias of the Learning Disabled Identification Procedures in the State of Washington," August 1986, page 24.

- Among students with a severe discrepancy, program time per week has a weak relationship with the amount of discrepancy.

- A severe discrepancy between IQ and achievement test scores is not a unique identifier of a learning disability. The discrepancy could exist for many other reasons.

These points suggest that the model has questionable validity, or at least that the model is not being used properly in the field.

Despite these problems, the model may have to be retained because no one has yet proposed a better method of identifying learning disabilities on a statewide basis. In that case consideration should be given to changing the model's criterion level, which determines the qualifying scores. As shown below, at the present criterion level a large number of students could qualify as LD if they were referred to special education.

5. Criterion Level in Regressed Standard Score Discrepancy Model

Little empirical evidence is available to suggest when a discrepancy between ability and achievement is in fact "severe" and should be construed as an indication of a learning disability. Under federal rules the state is free to set the criterion (cutoff) level at any reasonable point.

The regressed standard score discrepancy model was introduced in this state in 1984 without a clear sense of how many students would qualify. A study was later undertaken by SPI to determine what proportion of the school population has a severe discrepancy using the cutoff levels that had been adopted. A random sample of students was selected from regular education classes and then given individual IQ and achievement tests.

The SPI study found that 14 percent of the sample had a severe discrepancy when the Woodcock-Johnson tests were used to measure achievement. A full 30 percent of the sample had a severe discrepancy when student achievement was measured by the Wide Range Achievement Test-Revised.[3]

The SPI research indicates that 14 percent to 30 percent of regular education students could qualify as LD if they were referred to special education. This will not occur because the program funding formula contains disincentives against identifying more than 4 percent of a district K-12 population as LD. Unless changes are made, however, tension will remain between the flexible and multi-faceted eligibility criteria and the restrictive funding levels.

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[3] Superintendent of Public Instruction, "Final Report: An Evaluation of the Impact, Effectiveness, and Bias of the Learning Disabled Identification Procedures in the State of Washington," August 1986, page 18.

We obtained a copy of the model and calculated the impact of various possible changes in criterion level on the eligibility status of the students in our 5th and 9th grade LD data. We found that the model is not sensitive to minor alterations in criterion level. Large changes in the criterion level must be made in order to achieve a significant change in the qualifying scores.

If the regressed standard score discrepancy model is retained, we suggest that consideration be given to revising the criterion level so that the LD category is limited to students with a truly severe discrepancy between IQ and achievement. This could be accomplished by changing the criterion level for new students from 1.55 to 2.00. This change is equivalent to tightening the qualifying scores by five points. The present cutoff level could be retained for reassessments.

6. IQ Threshold

The concept of learning disabilities was developed on the basis of research that showed differences between specific learning disabilities and general mental retardation. It is often stressed that LD children have average or higher intelligence. Yet the state rules on LD provide for a minimum IQ of 76, or lower in cases of professional judgment. Such scores are not "average." The average range is usually defined as 85 to 115.

If individual IQ testing is retained in the eligibility determination process, consideration should be given to limiting the LD category to persons of average or above-average intelligence, defined as a minimum of 85 on the Wechsler scale. Students with IQs in the low 80s or high 70s could be served in LAP. School districts would retain the option under professional judgement to identify these students as LD.

Another approach to be considered is to abandon IQ testing as part of the LD eligibility determination and assume normal intelligence unless contrary evidence is present. The federal rules are general and do not appear to require an IQ test.

7. District Variation in LD Rates

In the 13 districts in which we reviewed files, LD students ranged from 3.1 percent to 7.2 percent of the K-12 population, with a median of 5 percent. We explored the reasons for this wide variation.

In addressing this issue, we assumed that learning disabilities could be reliably identified, that fairly uniform percentages of LD students should be expected, and that reasonable explanations of the variation between districts could be found. After reviewing the data from 13 school districts, however, we think that our assumptions were mistaken.

Given an unclear definition of LD and flexible eligibility criteria, large variation in LD enrollment will naturally occur. Variation, not uniformity, is the natural condition.

The controls in the present situation are (1) the 4 percent funding "lid," and (2) district understanding of the fiscal incentives and taking appropriate action at the local level to control the number of referrals. Districts with the high percentages of LD students have not controlled the number of referrals.

Local control is also possible through the classification decisions that are made in connection with student assessment and determination of eligibility. One district told us that it had recently reclassified about 10 percent of its LD students into other handicap categories in order to reduce the LD population to the 4 percent level. The category definitions are general enough to permit this type of action.

8. Health Impaired

In examining records in local school districts we explored reasons for the large increase in the number of handicapped students classified as health impaired. The average monthly health impaired enrollment has risen from about 1,700 in 1984-85 to over 4,200 in 1989-90.

The health impaired category was originally intended for medically fragile children. However, we found that the category is now dominated by children with a medical diagnosis of attention deficit disorder (ADD) and other presumed or actual neurological impairments. In the 13 districts that we visited to review 5th grade and 9th grade files, students with presumed or actual neurological impairments made up a combined total of 60 percent of the health impaired enrollment in those grades. Many of these students had been reclassified from the LD category.

The handicapped funding formula contains major incentives for school districts to utilize the health impaired category: (1) It helps to relieve the pressure of the four percent funding "lid" on the LD category, and (2) A health impaired student generates $1,500 to $2,000 more in state funding than a student classified as LD, depending on the number of LD students in the district.

This funding differential seems unrelated to student characteristics and program needs. In comparing the ADD and other "soft neurological" cases to LD students, we found that the two groups have:

- Similar average IQ.
- The same instructional placement (resource room).
- The same median hour per week of special education (an hour per day for the 5th graders and two hours for the 9th graders).

The one clear difference between the two groups is that about two-thirds of these health impaired cases do not have a severe discrepancy between ability and achievement.

The Washington State definition of the health impaired handicap differs from the federal definition and the definitions used in most other states. Washington recognizes presumed neurological disorders in the health impaired category. Federal law under Public Law 94-142 does not. The practice in most other states is to provide special education for a child diagnosed with attention deficit disorder if he meets the eligibility criteria for LD or another category, but not to recognize ADD as a qualifying health impairment.

Washington could address the problem of rising enrollment in the health impaired category by defining health impaired in conformity with the federal definition under Public Law 94-142. This possibility should be discussed, along with possible changes in category funding level.

C. Fiscal Issues

Although we focused our study on program issues, we found that many decisions in local school districts are heavily influenced by the fiscal incentives and constraints within the present system.

State funding is currently provided on the basis of the number of children identified as handicapped, with a different amount per handicap category. A school district gains no additional funding if it provides support services but does not go through the complex assessment procedure to identify the child as handicapped. In short, the present funding system contains distinct incentives for school districts to identify children as handicapped.

It is sometimes suggested that psychologists, social workers, and other support staff should be utilized to provide services to regular education students in an "early intervention and prevention model." However, this is discouraged under the current fiscal arrangements.

In one large school district, for example, we were told that school social workers are allowed to provide services to a student only if he has been identified as a handicapped student. The social workers are charged to the handicapped budget program (program 21 or 24, state or federal handicapped). These funds are supposed to be devoted entirely to special education purposes and not used to support regular education. Thus the budgeting arrangements encourage identification of children as handicapped in order to provide them with needed services.

Over half of the school social workers in the state are charged to program 21 or 24. Over 90 percent of the school psychologists are charged to those programs. Given current legal interpretations on the use of special education funding, these budgeting practices tend to discourage innovative uses of psychologists and social workers in regular education.

We are not clear on whether the problem described above is purely a matter of school district budgeting practice or whether the practice is somehow encouraged or required by the state handicapped funding formula. We hope that these issues will be addressed by the Office of Financial Management in its forthcoming study of special education.

Consideration should be given to proposing changes in state funding models and/or school district budgeting practices in order to support interventions in regular education and reduce fiscal incentives to identify students as handicapped.

D. Conclusions

Based on the above findings, we believe that major changes should be considered in the LD eligibility criteria. The fiscal issues mentioned above should also be addressed.

VII. Proposals for Change

A. Synthesis of Issues

In previous chapters we have discussed major problems in the current system for identifying and serving students with learning disabilities. Those problems can be summarized as follows:

- Students in different categorical programs have similar or overlapping achievement test scores and the same instructional needs. It is likely that special education and remedial program students will have similar achievement if given the same level of service.

- The assessment process for identifying students as learning disabled is expensive and has limited diagnostic and programmatic value. The process absorbs resources that could be devoted to instruction.

- Programs for LD and other mildly handicapped students provide little information on student outcomes and program effectiveness.

- The eligibility standards for the LD category of special education are somewhat open-ended and ensure that large numbers of children will be identified as learning disabled.

- The current funding system contains incentives to identify children as handicapped.

B. Preliminary Recommendations

In our preliminary report of June 1990, we made three wide-ranging recommendations for discussion purposes. Those recommendations can be summarized as follows:

1. Structural changes, e.g., expand Learning Assistance Program in lieu of identifying so many children as handicapped, change special education rules to require less time for LD assessment, consolidate mild handicap categories, consolidate categorical programs, change special education funding system to provide support for interventions in regular education and reduce incentives to identify students as handicapped.

2. Revise LD eligibility criteria so that LAP expansion or other changes in #1 can be fiscally-neutral.

3. Authorize demonstration projects with various features, e.g., waive state rules that exceed federal requirements, provide funding not tied to headcount of mildly handicapped students.

These recommendations were extensively discussed between June and December 1990 with various members of the legislature and the state's education community. We found that many people agree that the present system is not working well, but there is little agreement on what specific changes should occur.

Advocates generally favor recommendation #1, especially expanding LAP. They generally oppose recommendation #2. They are interested in recommendation #3.

For this proposed final report we develop the recommendation on demonstration projects, as discussed below. We withdraw the other recommendations because reform efforts should emphasize non-categorical approaches as much as possible. Preliminary recommendations #1 and #2 would not accomplish that, since in effect they retain a categorical approach and simply change the relative size of the various categorical "boxes," e.g., expand the LAP category and shrink the LD category.

School districts should be encouraged by the state to devise new approaches to create more efficient and effective non-categorical programs. Major changes are needed, but they are unlikely to occur in the near future on a statewide basis. Thus we propose to proceed via demonstration projects.

C. Goals and Directions of Demonstration Projects

1. More Efficient Use of Available Resources

Demonstration projects would be intended in part to encourage more efficient use of available resources, such as the following practices:

a. "Blending" (pooling) of categorical program resources (handicapped, LAP, Chapter 1, and perhaps bilingual) to achieve an integrated program of special services to students who need help in school. Desired impacts: break down categorical program "walls" within the district, create non-categorical services under the control of one special services administrator.

b. Less "labelling" of students (e.g., as learning disabled), both for funding purposes and service delivery. Desired impacts: program entry when needed without delays for eligibility determination, service delivery in non-categorical, unlabelled settings.

c. More efficient means of identifying LD students which might eventually replace the state method of determining the existence of a "severe discrepancy between ability and achievement." Desired impacts: decrease staff time/cost devoted to assessment, increase resources available for classroom instruction.

Demonstration projects could also stimulate better local planning, organization, and management. For example:

- Decrease class size of the regular classroom by using LD, LAP, or Chapter 1 teachers as regular classroom teachers, rather than in "pull-out" classes only.

- Use psychologists as classroom intervention specialists, rather than as psychometricians who concentrate on administering IQ and other tests with limited educational value.

2. Service Delivery Models

The legislation should also encourage school districts to adopt an appropriate service delivery model. Some examples of service delivery models are given below.

- "Pull-out" model, used in most districts. The student receives special education in a "resource room" for an hour or two per day, usually from a certificated special education teacher, sometimes with assistance from a classroom aide. Pull-outs are also the predominant model used for LAP and Chapter 1 students. Pull-out models often include program segregation. In other words, each program has separate teachers, students, and classrooms.

- "Pull-in" model, in which the student stays in the regular classroom and receives help for part of the day from a specialist, such as a reading specialist, psychologist, or other professional staff. Example: Olympia School District MERGE program (Maximizing Educational Resources in General Education). The MERGE program is used in the district's elementary schools and in one of the three middle schools.

- The Mukilteo model, operated by Mukilteo School District mostly as a "pull-out" model which serves LD, LAP, Chapter 1, and bilingual students (mixed together) in a learning support center. Direct service is provided by paraprofessionals, under supervision of a certificated special education teacher. This feature greatly reduces program costs and allows the district to expand the number of students served.

- "Integrated classroom" model, in which the regular education teacher has special education credentials. The classroom is made up of 1/3 mildly handicapped students and 2/3 regular education students. Issaquah School District has pioneered this model.

- "Consulting teacher" model, in which the special education student receives instruction in the regular classroom from the regular education teacher, who receives consultation from a teacher with special education credentials. This model was recently legalized by a change in the state rule definition of special education.

- "Site-based decision-making" model, in which the crucial decisions are made by the building team or principal, as opposed to centralized decision-making by district administrators.

- Variations and combinations, such as "single dose" and "double dose" pull-outs, same grade or cross grade skill groupings, and team teaching. In Edmonds School District, for example, at least nine service delivery models are in use for students with learning problems.

The legislation should promote service delivery models that result in more efficient use of available resources. However, the legislation should not mandate use of any particular model, for at least three reasons:

a. Available data are fragmentary and not conclusive on program efficiencies attained by the various models.

b. Progressive school districts use different models. Models also vary by building and grade level, even within the same district.

c. Available data do not prove that any particular model is more beneficial in terms of student impacts, as measured by standardized achievement test scores or tests of student self-esteem or social skills.

3. Conclusions

A main goal of demonstration projects would be to use resources more efficiently. The project evaluation could focus on efficiency measures, such as staff utilization, number of students served, hours of direct service, cost per unit of classroom service, and class size.

Another goal would be to ascertain, if possible, the effectiveness of the project, i.e., the impact on student learning. This is a difficult topic. It is unclear at the present time how student impacts should be measured.

Evidence will be needed to show, at a minimum, that student learning is not being adversely affected by the demonstration, i.e., that student scores are not declining.

To address project effectiveness, the legislation should (1) require annual administration of standardized achievement tests to all project students, and (2) encourage districts to develop other measures of student learning. Some districts are actively interested in developing curriculum-based measures, both to identify the target population and evaluate program effectiveness.

In addition, the demonstration projects should include, as part of the evaluation, surveys to assess parent and teacher satisfaction.

D. Proposed Legislation

Recommendation: We recommend that the legislature authorize special services demonstration projects, as outlined below.

1. Legislative Intent

a. Encourage school districts to develop innovative special services programs which use resources more efficiently and increase student learning.

b. Promote non-categorical approaches to special service program design, funding, and administration.

c. Develop means for identifying students to receive special services that are more efficient and less costly than the assessment and eligibility determination procedures required by WAC 392-171 for learning disabled students.

d. Increase the proportion of program resources devoted to classroom instruction.

e. Provide project funding that is sufficient to cover project costs but avoids the incentives under the current handicapped allocation model to identify students as handicapped in order to receive special education funding.

f. Provide a means to grant waivers from state rules, especially those that exceed federal requirements. Specific waivers are to be requested by school districts in response to a request for proposals for demonstration projects.

2. Project Duration

   a. Projects should be authorized for up to four years, i.e., during the next two biennia. Projects in some districts could be started during the next school year (1991-92), and run for four years. Other districts will need more time to "gear up." Those projects would start in the 1992-93 school year, and run for three years.

   b. The legislature will want to know the project results as soon as possible, probably in one or two years. However, longer-term projects are needed to work out operational problems and collect longitudinal data. Three- or four-year projects are needed for evaluation purposes.

   c. Statewide changes could be made before the end of the projects, without waiting for all evaluation results.

3. Number of Authorized Projects

   a. We propose that the legislation authorize from 10 to 25 demonstration projects, depending on the quality of district proposals and the availability of funding.

   b. Legislative decisions on the number of authorized projects will be influenced by the fiscal impact of the legislation. The proposed method of project funding (described below) is fiscally-neutral in terms of operating funds. However, additional funding would be needed for inservice training, technical assistance, and project evaluation.

4. State Administration

   a. The legislation should create a project oversight board composed of representatives of the Legislative Budget Committee, legislative standing committees, Office of Financial Management, and Superintendent of Public Instruction.

   b. The board would issue requests for proposals, receive proposals from school districts, make the project awards, and recommend that SPI grant waivers to selected districts. (The board would also be responsible for technical assistance and project evaluation, as discussed later.)

   c. SPI would be responsible for rule waivers, contract payments, and other state administration.

5. Project Funding

a. Includes the state and federal funds received by the district for categorical programs, as specified in the district's cost proposal and negotiated in the contract.

b. The following general rule would determine what portion of state handicapped funding is included as project funding. If the district proposes to serve LD students in the project, then the LD portion of the handicapped allocation is included, with proportional adjustments if the project serves only part of the LD population (e.g., only elementary school students). If other handicapped students are to be served in the project, then those portions of the handicapped allocation are also included.

c. Allocations for LD or other handicapped students are based on the average percentage of K-12 students in the relevant category in the two years prior to the project. Funding will remain "pegged" at that percentage level for the duration of the project.

d. Exceptions: (1) The project oversight board should have discretion to determine the funding percentage if it determines that LD or other handicapped enrollment has unusual characteristics so that funding under item c. above is not appropriate. (2) The funding percentage would be negotiated for school districts which have decreased their LD enrollment in previous pilot projects, e.g., the so-called "House Bill 1444 pilot projects" authorized in 1989 but not fully funded by SPI.[1]

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[1] Three districts (Edmonds, Olympia, and Franklin Pierce) submitted applications for pilot projects in the 1989-90 and 1990-91 school years. SPI approved the applications but provided no funding for the first year, despite an appropriation of $1.5 million. Funding for the second year is still in dispute. As of early January 1991, Edmonds has received funding, but Olympia and Franklin Pierce have not.

The pilot project legislation expires at the end of the 1990-91 school year. A bill will be introduced in the 1991 session to continue the pilot projects, authorize other projects, clarify technical issues disputed between SPI and the school districts, and require SPI to provide funding. Note: This bill is a separate measure from the legislation proposed in this report.

e. The method of allocating state handicapped funds would be changed for the project districts to provide flexibility in the use of funds. Allocations up to the level required by federal maintenance of effort rules would continue to be expended for services to handicapped students. Allocations greater than the amount needed for maintenance of effort would be designated as non-categorical project funds, to be expended on services to any student served in the project, without regard to categorical label. This approach is illustrated by a graph on page 43.

f. The non-categorical funding would include:

-- State handicap allocations above and beyond federal maintenance of effort requirements for the handicap categories proposed to be served in the project.

-- Inflation increases and any other increases in LAP funding in the project districts.

-- Inflation increases and any other increases in bilingual funding, if the district proposes to include those students in the project.

h. Project funding may include federal and local funding, if justified by the district's cost proposal and tracked during the project.

6. Technical Assistance

a. The legislation should provide funding to be awarded by contract to project districts for inservice training of teachers and support staff. This includes both "up front" and ongoing staff development.

b. The legislation should provide for technical assistance services to school district administrators on project design, operations, and administration. The legislation should appropriate funds to the project oversight board with instructions to issue an RFP for technical assistance services. Private and public organizations could compete for the contract award. Potential bidders might include:

-- Office of Superintendent of Public Instruction
-- Washington Education Association
-- Washington State School Directors' Association
-- Washington Association of School Administrators
-- Association of Washington School Principals
-- Educational Service Districts
-- Local school districts
-- Private consultants.

7. Project Reporting

   a. Students served.
   b. Staff utilization.
   c. Class size.
   d. Expenditure data by funding source. (This may not be necessary if all project funds are contract payments.)
   e. Outcome data.
   f. Avoid monthly reporting. Quarterly or twice a year?
   g. District proposals should request waiver of state record keeping and data reporting requirements to be superseded by the project.

8. Project Evaluation

   a. The legislation should appropriate funds to the project oversight board for a project evaluation by an outside party, rather than requiring an evaluation report from each district.

   b. The evaluation should focus on efficiency measures and possibly also on effectiveness measures. See above, page 33, section headed "Conclusions."

   c. Other evaluation options:

      -- LBC does evaluation.
      -- Sunset review, but no formal research evaluation.

9. Rights of Handicapped Students

   The legislation will not alter or affect the rights of handicapped students under federal law. Project districts must respect those rights. The legislation should require project districts to have significant involvement by parents of handicapped students in project planning and implementation. The same applies to parents of other students served in the project.

Appendix 1

Summary of Recommendations

Recommendation

We recommend that the legislature authorize special services demonstration projects, as outlined on pages 34-38 of this report.

Legislation Required:	Yes.
Completion:	1991 legislative session.
Fiscal Impact:	Fiscally neutral in terms of operating funds. Additional funding needed for (1) inservice training of teachers and support staff, and (2) project evaluation and other activities of oversight board. Fiscal note is being prepared.

Appendix 2

Data Exhibits

Three exhibits appear on the following pages. The first chart is a list of the school districts that we visited to review program files. The enrollment data in the chart refer to the 1988-89 school year.

The second chart is summary data on 627 learning disabled students obtained by aggregating our data from the 13 districts. Various detailed breakouts and analyses of the data are available from the LBC staff.

The third exhibit (page 43) is a graph to illustrate our proposed approach for funding demonstration projects. The approach is discussed on page 36.

1988-89 Handicapped Average Monthly Enrollment in Selected School Districts

Ranked by Learning Disabled (LD) as percent of K-12 enrollment (last column)

	District	Enrollment ** K-12	Enrollment ** Handicapped	HC % of K-12	Selected Handicap Categories LD	BD	Health	Total	Select Total as % of HC	Select Total as % of K-12	LD % of K-12
1	Tacoma	27,498	4,221	15.4%	1,967	550	125	2,643	62.6%	9.6%	7.2%
2	Battle Ground	7,078	969	13.7%	448	32	28	508	52.4%	7.2%	6.3%
3	Vashon Island	1,480	142	9.6%	86	4	14	104	73.1%	7.0%	5.8%
4	ESD 123 Coop (17 districts)	8,598	886	10.3%	462	12	24	498	56.2%	5.8%	5.4%
5	Issaquah	7,428	763	10.3%	387	66	71	523	68.6%	7.0%	5.2%
6	Franklin Pierce	5,555	624	11.2%	282	38	17	336	53.8%	6.1%	5.1%
7	Spokane	26,047	2,502	9.6%	1,313	78	133	1,524	60.9%	5.9%	5.0%
8	North Thurston	10,384	1,008	9.7%	511	57	30	598	59.4%	5.8%	4.9%
9	Aberdeen	3,448	443	12.9%	158	44	11	213	48.0%	6.2%	4.6%
10	Seattle	40,451	4,120	10.2%	1,817	361	161	2,339	56.8%	5.8%	4.5%
11	Vancouver	14,556	1,513	10.4%	633	74	48	754	49.9%	5.2%	4.3%
12	Olympia	6,853	617	9.0%	238	22	18	278	45.0%	4.0%	3.5%
13	Mukilteo	7,820	670	8.6%	240	30	31	301	44.9%	3.8%	3.1%
Selected District Total		167,198	18,477	11.1%	8,541	1,367	710	10,618	57.5%	6.4%	5.1%
State Total		748,418	76,153	10.2%	35,118	4,089	3,508	42,715	56.1%	5.7%	4.7%
Selected Districts as Pct. of State		22.3%	24.3%		24.3%	33.4%	20.2%	24.9%			

** K-12 enrollment figures are the average annual FTE; handicapped enrollment is average annual headcount.
Figures include resident students only. Students from other districts are excluded from the figures.
Exception: the figures shown for ESD 123 Coop are a combination of the 17 member districts as of 1988-89.

Sources: SPI reports 1251 (K-12) and 1735 (handicapped) as of September 5, 1989.

LBC:MT 12/6/89.

EXHIBIT 6.2

Students Identified as Learning Disabled

Summary Data: 13 Districts Combined

	5th Graders		9th Graders	
Number of Students	327		300	
Male	222	68% of 327	226	75% of 300
Female	105	32%	74	25%
White	273	83%	244	81%
Minority	55	17%	56	19%
Mean Age at Latest Assessment	9.3	years	13.5	years
Initial Assessments	179	55%	73	24%
Reassessments	114	35%	197	66%
Transfers	34	10%	30	10%
Items Noted in Student Files:				
Behavior Problems	116	35%	121	40%
Suspected Neurological Impairment	25	8%	10	3%
On Medication	17	5%	10	3%
Wechsler Intelligence Scales:				
Verbal Mean (and Std Dev)	93.4	(12.9)	88.6	(11.5)
Performance Mean	99.8	(13.5)	97.5	(13.5)
Full Scale Mean	95.9	(12.2)	92.5	(10.6)
Full Scale Median	94		92	
V-P split of 18 points or more	77	24%	73	24%
Woodcock-Johnson Achievement Tests				
Standard score divided by criterion value:				
1.00 and lower = severe discrepancy,				
1.01 and higher = no severe discrepancy				
Reading Mean (and Std Dev)	1.02	(.11)	1.09	(.12)
Math Mean	1.06	(.12)	1.05	(.12)
Written Language Mean	1.02	(.11)	1.06	(.12)
Battery Average	1.03	(.09)	1.07	(.10)
Eligibility				
by Severe Discrepancy	259	79%	169	56%
by Professional Judgment	68	21%	61	20%
by Alternate Method	0		61	20%
by Continuing Eligibility	0		9	3%
Hours per Week of Special Ed.				
Mean (and Std Dev)	7.3	(5.3)	8.0	(3.3)
Median	5.3		10.0	

LBC: MT 12.28.89. File G5&9SUM

This chart shows the amount of state dollars for learning disabled students (statewide) funded in excess of the federal maintenance of effort requirements. If the approach recommended for the demonstration projects were applied to the current 1990-91 school year (using 1987-88 as a base year), $22 million could have been available for non-categorical services for underachieving students. In the proposed demonstration projects, the base year would be the year prior to the start of individual projects.

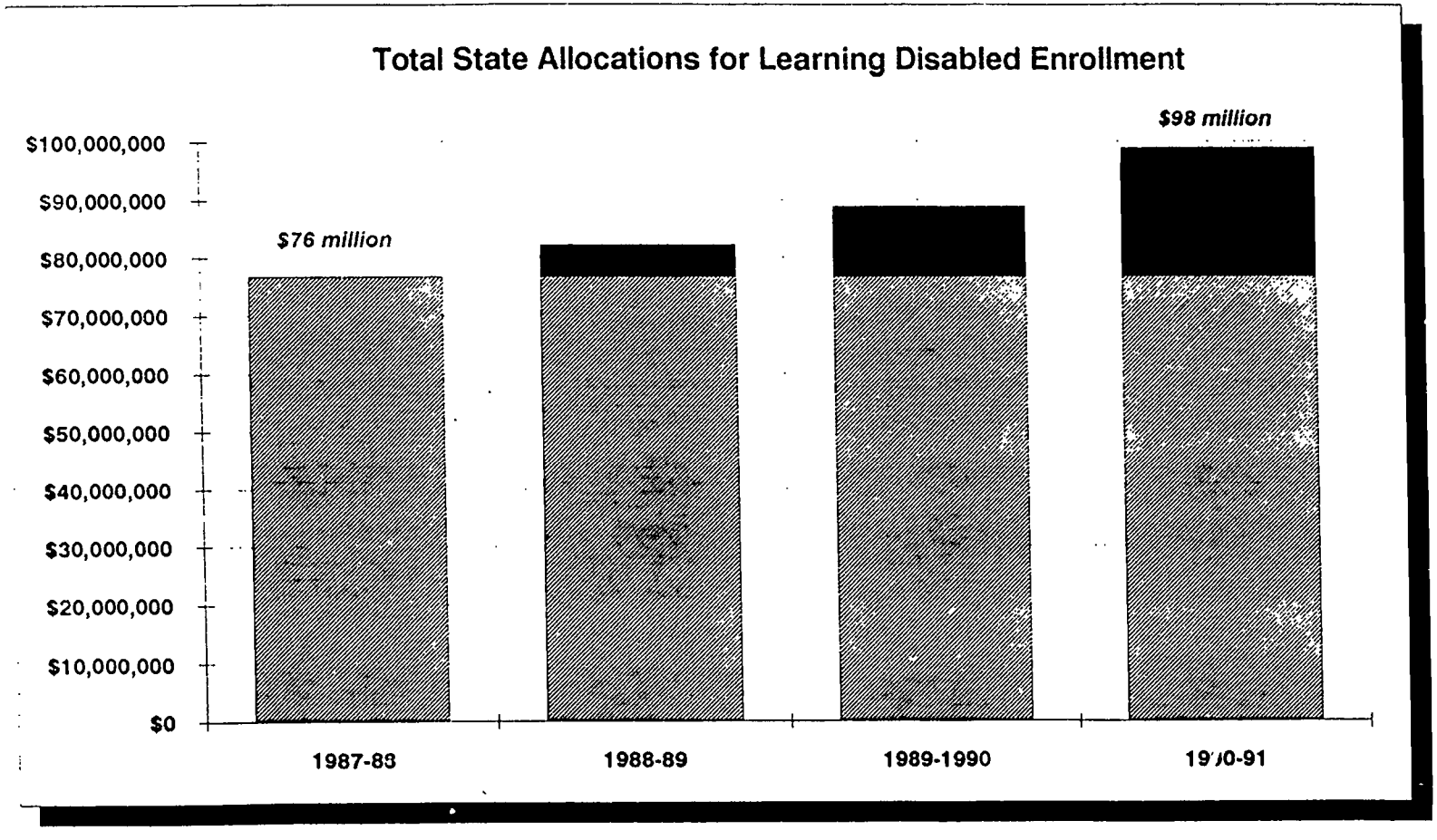

EXHIBIT 7

Appendix 3

Agency Comments

Summary of Written Responses to Proposed Final Report

		Concur	Partially Concur	Do Not Concur
1	Superintendent of Public Instruction		X	
2	Washington Education Assn	X		
3	WA State School Directors Assn	X		
4	WA Assn of School Administrators	X		
5	Assn of WA School Principals	X		
6	Assn of School Psychologists	X		
7	Reading Reform Foundation	X		
8	Special Education Coalition	X		
9	Learning Disabilities Assn		X	
10	WA PAVE Parent Projects		X	
11	Edmonds School District : Steve Fink	X		
12	Olympia School District: Stillman Wood	X		
13	Spokane School District: Ed Gaffney	X		
14	Vancouver School District: Tom Cone	X		
15	ESD 112 Coop: Dennis Mathews	X		

Copies of the responses are on file at the office of the Legislative Budget Committee.

SPI

JUDITH A. BILLINGS

Superintendent of Public Instruction

January 3, 1991

The Honorable Helen Sommers, Chair
Legislative Budget Committee
506 East 16th, KD-11
Olympia, WA 98504

Helen

Dear Representative Sommers:

Thank you for the copy of the Legislative Budget Committee proposed final report on K-12 Learning Disabilities. The Office of Superintendent of Public Instruction supports the recommendation for special services demonstration projects.

As the Superintendent of Public Instruction, I am responsible for supervision of all public school programs in the state of Washington, including special education programs. The Office of Superintendent of Public Instruction should be the agency that issues the requests for proposals, reviews and approves the demonstration projects, and provides technical assistance and oversight for project implementation. The group listed as an oversight committee in your recommendation might well be useful as an advisory committee for these projects.

The following issues need to be considered as these projects are developed:

1. While it is important to use resources efficiently, the primary goal of educational programs must be to meet student needs. Therefore, the goal of the demonstration projects should be to improve the educational services for learning disabled and low performing students.

2. Requests for waivers for state regulations will be considered on a case by case basis. All demonstration projects must meet minimum procedures required by federal regulations. Handicapped students are guaranteed certain civil and due process rights by the Individuals with Disabilities Education Act (formerly the Education of the Handicapped Act) and Section 504 of the Vocational Rehabilitation Act, 1973. Consideration must be given to the rights of handicapped students who transfer into a demonstration project district.

3. In addition to the expectation that special education funds be spent on handicapped students, federal maintenance of effort requirements must be met. Chapter 1 and other categorical programs also require fiscal accountability.

Old Capitol Building, FG 11, Olympia, Washington 98504-3211

4. Endorsements by local education associations and special education parent groups should be considered as part of the application process.

Because coordination of categorical resources occurs most successfully at the building level, the Office of Superintendent of Public Instruction has collaborated with the Association of Washington School Principals for the past several years to train general and special education school level teams. It is our hope that this effort will result in a more unified approach to the education of all children.

The Office of Superintendent of Public Instruction encourages innovative practices in the provision of educational opportunities for all children. I hope that the information gathered by the Office of Financial Management and by your committee will be useful in our forthcoming comprehensive study of the funding and program issues in special education.

Sincerely,

Judith

Judith A. Billings
State Superintendent
of Public Instruction

JAB: JP: je

c: Members, Legislative Budget Committee
Cheryle A. Broom, Legislative Auditor
Ron Perry, Legislative Budget Committee Staff

FACTS ABOUT THE LEGISLATIVE BUDGET COMMITTEE

The Legislative Budget Committee (LBC) is a statutory joint committee of the Washington State Legislature. Membership consists of eight senators and eight representatives equally divided between the two major political parties. Under Chapter 44.28 RCW and other statutes, the LBC performs various legislative oversight activities.

The LBC staff, headed by the Legislative Auditor, conducts performance audits, sunset reviews, policy studies, and other types of special studies. Committee reports often focus on the economy, efficiency, and effectiveness of state programs and agency operations, including whether appropriations have been expended in accordance with legislative intent. Other oversight work includes monitoring of unanticipated revenues and agencies' use of consultants.

Committee meetings are usually held on a monthly basis during the interim between legislative sessions. Reporting directly to the legislature, the LBC makes recommendations for legislative consideration and action.